

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DARLENE PACHECO

Docket No. 05-10032-PBS

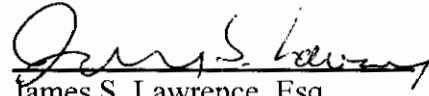
**DEFENDANT'S MOTION FOR WAIVER OF THE ELECTRONIC FILING  
REQUIREMENT**

Now comes the Defendant, by and through her undersigned counsel, and hereby moves this Honorable Court for a waiver of the electronic filing requirement regarding Defendant's Motion for a Downward Departure which as been filed contemporaneously herewith. As grounds therefore, Defendant's attorney states:

1. Currently Defendant's counsel is not registered for electronic and is scheduled to take the requisite training class on August 31, 2005, in the United States Bankruptcy Court for the District of Rhode Island.
2. Defendant's counsel will not be able to register for electronic filing with this Honorable Court until after completion of the training class on August 31, 2005.
3. This Honorable Court has scheduled Defendant's sentencing for September 8, 2005, and to eliminate delay, Defendant's counsel request a waiver of the electronic filing requirement for Defendant's Motion for a Downward Departure.

WHEREFORE, Defendant prays that the within motion be granted and that this Honorable Court waive of the electronic filing requirement regarding Defendant's Motion for a Downward Departure.

Respectfully Submitted,  
DARLENE PACHECO  
By her Attorney,



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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 16<sup>th</sup> of August, 2005, I did send via facsimile and via first class mail, postage prepaid to:

Tricia Marcy, U.S. Probation Office  
1 Courthouse Way, Suite 1200  
Boston, MA 02110

Adam Bookbinder, Asst. U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02110

